

Differences and Changes Between the 2010 Final Aquatic Mosquito Control General Permit and the Draft 2015 Permit.

S1. PERMIT COVERAGE

Moved “Who Must Obtain Permit Coverage” to permit condition S2.

S1.A Activities Covered Under this Permit

- Was previously “Who Must Obtain Permit Coverage”.
- Changed to match formatting of other permits.
- S1.A updated language to specify a discharge to surface waters of the State of Washington.
- Changed “Who Must Obtain Permit Coverage” to “Activities Covered Under This Permit” to match other permits.

S1.B Activities That May Not Need Coverage Under This Permit

- Partially combined with permit condition S1.D in 2010 permit.
- Added statement that mosquito control activities carried out under another Ecology permit that addresses mosquito control activities may not need coverage under this permit.

S1.C Geographic Area Covered

- Renamed from “Permit Area”.
- Added standard language for the areas in which this permit applies within Washington.
- Updated language about permitting on Tribal and Federal Lands to reflect changes in permit management policy and updated understanding of permitting law on these lands

S1.D Authorized Discharges

- Removed this section. This falls under permit conditions S1. A and B.

S1.E Transfer of Washington State Department of Health Blanket Permit Coverage

- Removed this section because it is not longer applicable.

S2. PERMIT ADMINISTRATION

- Changed section title from “Application for Coverage” because this section now includes other administrative tasks related to the permit such as modification, transfer, and termination of permit coverage. The new sections were added in response to questions that Ecology receives routinely about administrative tasks.

S2.A Who Must Obtain Permit Coverage

- The language was previous located in permit condition S1.A. To be consistent with the other aquatic pesticide permits, it was moved here. The language was modified for clarity and to make the requirements more consistent with other aquatic pesticide general permits.

S2.B How to Apply for Permit Coverage

- This section contains most of the original language from permit condition S2 of the 2010 permit. The language has been modified slightly to reflect changing policy about how to issue permit coverages, e.g., reducing the days to issue permit coverage from 60 to 38.

S2.C Permit Coverage Timeline

- New section for 2014.

S2.D How to Modify Permit Coverage

- New section for 2014.

S2.E How to Transfer Permit Coverage

- New section for 2014.

S2.F How to Terminate Permit Coverage

- New section for 2014.

S3. DISCHARGE LIMITS**S3.A Compliance with Standards**

- Updated this section to match standard language in other aquatic pesticide permits.

S3.B Temporary Exceedance of Water Quality Standards

- Was previously titled "Temporary Exceedance of Water Quality Standards for Larvicides"
- Updated this section to match standard language in other aquatic pesticide permits.

S3.C Impaired Water Bodies

- New section for 2014.
- This is standard language from other aquatic pesticide permits.

S3.D Pesticide Application Requirements

- Moved to permit condition S4.B, there is no longer a permit condition S3.D.

S4. PRODUCT USE

- Changed heading from “Pesticide Active Ingredients” to “Product Use”.
- Moved permit condition S3.D “Pesticide Application Requirements” to permit condition S4.B.
- Added new permit condition – S4.D “Sensitive Species” which moved “Experimental Use of Pesticide Active Ingredients” to permit condition S4.E.

S4.A Active Ingredients Authorized for Use

- Was previously “S4.A Larvicide Active Ingredients Authorized for Use”
- Combined permit conditions S4.A and B into a single permit condition.

S4.B Pesticide Application Requirements

- Was previously “S4.C Additional Restrictions for Larvicides and Adulticides”.
- Contains requirements that were in the 2010 permit conditions S4.C and S3.D.
- Language updated to use standardized language from other aquatic pesticide permits and for clarity.
- Requires Permittee to get plan approval from Ecology when using non-Bacillus based treatments in sensitive species habitat areas. Plan approval by Ecology will require Permittees to get letters of concurrence from WDFW and the land management agency if one exists.
- Removed references to Appendix B. Appendix B has been removed from the permit and into its own document titled: “*Areas of Restricted Larvicide and Adulticide Use Due to Presence of Vulnerable (Endangered, Threatened, or Sensitive) Species*”. Maps of the areas with vulnerable species, as described by Township, Range, Section, are now included in the document.

S4.C Experimental Use

- Was previously permit condition S4.D “Experimental Use of Pesticide Active Ingredients”.
- Updated to reflect standard language from other aquatic pesticide permits.

S5. INTEGRATED PEST MANAGEMENT PLAN

- Changed heading from “Integrated Mosquito Management Plan”
- Removed language related to transfer of coverage from Washington Department of Health, which is no longer an option.
- Removed duplicative language.

S5.L Public Access to IMM Plans

- Moved to permit condition S8.C.
- Renamed to “Public Request for Plans” to include IPM plans.

S6. NOTIFICATION AND POSTING REQUIREMENTS

- Changed heading from “Public Notification of Pesticide Use”.
- Changed to allow notification to be posted on the Permittee’s website or in the local newspaper.
- Based on some of the discussion in Appendix B of the previous (2010) permit, added a requirement to notify wildlife refuges at least 24 hours before any aerial application of larvicide or adulticide over wildlife refuges.

S7. MONITORING

- Added standard monitoring language used in other aquatic pesticide permits as required by WAC 173-226-090.

S8. REPORTING

- Updated to include standard language included in other aquatic pesticide permits.
- Added permit reopener language in case database redevelopment for this permit occurs during the 2015-2020 permit cycle.

S8.A Annual Report

- Removed duplicate language for clarity.
- Changed the reporting of active ingredient to pounds of active ingredient only instead of pounds or gallons of active ingredient.
- Changed to add reporting of treatments occurring in sensitive species habitat and the pounds of active ingredient used for those treatments.

S8.C Public Request for Plans

- Moved from permit condition S5.L
- Changed heading from Public Request for IMM Plans.

S8.D Noncompliance Notification

- Updated language to follow the standard language used in the other aquatic pesticide permits.

S9. APPENDICES

- Appendix A relabeled to “Definitions” to match the other aquatic pesticide permits.
- Due to other appendices being removed, the appendix for permit condition S5 “IMM Plan Criteria Examples” is now Appendix B.
- Removed appendices for the Transfer of Permit Coverage Form (2010 permit Appendix C) and Permit Coverage Public Notice Template (2010 permit Appendix D). These are now separate documents.

- Removed Appendix B: Areas of restricted pesticide use due to presence of listed species. This is now a separate document titled *“Areas of Restricted Larvicide and Adulticide Use Due to Presence of Vulnerable Species”*.

Appendix A: Definitions

Updated definitions to match definitions from other permits and work being done to standardize the meanings of terms used in permits.